

**From:** [Eyth, Alison](#)  
**To:** [Palma, Elizabeth](#)  
**Subject:** FW: Re[2]: Virginia Non-EGU Comments  
**Date:** Wednesday, October 10, 2018 11:15:48 PM

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-----Original Message-----

From: Ballou, Thomas (DEQ) [<mailto:Thomas.Ballou@deq.virginia.gov>]  
Sent: Friday, August 11, 2017 10:29 AM  
To: janssen@ladco.org; doris.mcleod@deq.virginia.gov; Eyth, Alison <Eyth.Alison@epa.gov>  
Cc: Narasimhan, Kotur (DEQ) <Kotur.Narasimhan@deq.virginia.gov>; Robert Kaleel <kaleel@ladco.org>  
Subject: RE: Re[2]: Virginia Non-EGU Comments

Mark - thanks for the followup and I'm sorry I missed that point from the webinar. Unfortunately Doris is out today so hopefully Alison can use what we sent.

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From: Mark Janssen [janssen@ladco.org]  
Sent: Friday, August 11, 2017 10:10 AM  
To: McLeod, Doris (DEQ); Ballou, Thomas (DEQ); eyth.alison@epa.gov  
Cc: Narasimhan, Kotur (DEQ); Robert Kaleel  
Subject: Re[2]: Virginia Non-EGU Comments

Yes, That was my suggestion in the webinar, Just apply control factors to the existing units. It is not perfect because you will also capture the stack characteristics of the original unit and the temporal and chemical speciation characteristics of the original(coal) SCC. But since we are moving to likely very low emissions, a near zero numerator mitigates most of the problems.

Mark

----- Original Message -----

From: "McLeod, Doris (DEQ)" <Doris.McLeod@deq.virginia.gov>  
To: "Mark Janssen" <janssen@ladco.org>; "Ballou, Thomas (DEQ)" <Thomas.Ballou@deq.virginia.gov>; "eyth.alison@epa.gov" <eyth.alison@epa.gov>  
Cc: "Narasimhan, Kotur (DEQ)" <Kotur.Narasimhan@deq.virginia.gov>  
Sent: 8/10/2017 7:27:03 PM  
Subject: RE: Virginia Non-EGU Comments

>Hey Mark, when I reviewed the controls spreadsheet, it asked for  
>effectiveness and penetration, which I usually think of in conjunction  
>with control programs rather than singular controls due to permits or  
>enforcement actions. I had discussed the situation with Alison, and she  
>thought applying a control to the coal fired scc would be a better  
>approach than retiring the coal fired scc and adding in a boiler gas  
>scc in situations like Philip Morris, where their old boilers finally  
>fell apart. You probably discussed this on the webinar, but I was not  
>able to attend. I think all the identifiers and control efficiencies  
>needed are in the tab we provided tho to make the reductions. Again?  
>Apologies for missing the webinar and for misinterpreting that  
>spreadsheet. -Doris \_\_\_\_\_  
>From: Mark Janssen [janssen@ladco.org]

>Sent: Thursday, August 10, 2017 10:28 AM  
>To: Ballou, Thomas (DEQ); eyth.alison@epa.gov  
>Cc: McLeod, Doris (DEQ); Narasimhan, Kotur (DEQ)  
>Subject: Re: Virginia Non-EGU Comments  
>  
>Thanks very much Thomas,  
>  
>After reviewing your comments, why would the fuel switches not fit into  
>the existing control format?  
>  
>Mark  
>  
>  
>----- Original Message -----  
>From: "Ballou, Thomas (DEQ)"  
><Thomas.Ballou@deq.virginia.gov<<mailto:Thomas.Ballou@deq.virginia.gov>>>  
>To: "janssen@ladco.org" <janssen@ladco.org<<mailto:janssen@ladco.org>>>;  
>"eyth.alison@epa.gov" <eyth.alison@epa.gov<<mailto:eyth.alison@epa.gov>>>  
>Cc: "McLeod, Doris (DEQ)"  
><Doris.McLeod@deq.virginia.gov<<mailto:Doris.McLeod@deq.virginia.gov>>>;  
>"Narasimhan, Kotur (DEQ)"  
><Kotur.Narasimhan@deq.virginia.gov<<mailto:Kotur.Narasimhan@deq.virginia.gov>>>  
>.gov>>  
>Sent: 8/10/2017 8:21:24 AM  
>Subject: Virginia Non-EGU Comments  
>  
>Mark/Alison:  
>  
>Thank you for coordinating the submission of additional comments on the  
>Virginia non-egu sector to be used in EPA's next round of transport  
>modeling in the fall. Attached is an updated closures and projected  
>control file with the changes that we request be made to this inventory  
>sector.  
>  
>Please note that DEQ has added an additional tab to the spreadsheet to  
>include information on coal/residual oil to natural gas conversions as  
>well as to account for SCR control at a nylon production facility's  
>non-steam-generating process units. These reductions of NOx and SO2  
>total over 10,000 tons of NOx and over 1,000 tons of SO2 from BY 2011.  
>However, the suggested spreadsheet formats did not seem to address such  
>changes. After discussion with Alison, my staff added the additional  
>tab to include this information for EPA review, and we have provided  
>suggested NOx and SO2 reductions from the BY for these units.  
>  
>If you have any questions concerning this updated information, please  
>contact Doris McLeod  
>(doris.McLeod@deq.virginia.gov<<mailto:doris.McLeod@deq.virginia.gov>>)  
>or Kotur Narasimhan  
>(kotur.narasimhan@deq.virginia.gov<<mailto:kotur.narasimhan@deq.virginia.gov>>).  
>  
>Thanks again.  
>  
>Thomas R. Ballou  
>Air Data Analysis & Planning Manager  
>VA Department of Environmental Quality  
>629 E. Main Street, Richmond, VA 23219  
>(804) 698-4406

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